

Exhibit B

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF**

-----X

Plaintiff/Petitioner,
- against -

Index No.

Defendant/Respondent.

-----X

**NOTICE OF ELECTRONIC FILING
(Consensual Case)
(Uniform Rule § 202.5-b)**

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.

The **benefits of participating in e-filing** include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

To register for e-filing or for more information about how e-filing works:

- visit: www.nycourts.gov/efile-unrepresented or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at www.nycourts.gov

To find legal information to help you represent yourself visit www.nycourthelp.gov

Information for Attorneys

An attorney representing a party who is served with this notice must either consent or decline consent to electronic filing and service through NYSCEF for this case.

Attorneys registered with NYSCEF may record their consent electronically in the manner provided at the NYSCEF site. Attorneys not registered with NYSCEF but intending to participate in e-filing must first create a NYSCEF account and obtain a user ID and password prior to recording their consent by going to www.nycourts.gov/efile

Attorneys declining to consent must file with the court and serve on all parties of record a declination of consent.

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: efile@nycourts.gov).

Dated: _____

Name

Address

Firm Name

Phone

E-Mail

To: _____

6/6/18

STATE OF NEW YORK
SUPREME COURT : COUNTY OF NIAGARA

KAITLYNN GANNON
2232 Ridge Road
Lewiston, New York 14131

Plaintiff,

vs.

SHERIFF MICHAEL J. FELICETTI
5526 Niagara Street Ext
Lockport, New York 14095

NIAGARA COUNTY SHERIFF'S OFFICE
5526 Niagara Street Ext
Lockport, New York 14095

JOHN AND JANE DOE

COUNTY OF NIAGARA
175 Hawley Street
Lockport, New York 14094

Defendants.

Index No.

Plaintiffs designate Niagara
County as the place of trial

The basis of venue is
Defendants' residence

SUMMONS

County of Niagara

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your answer, or, if the Complaint is not served with this Summons, to serve a notice of appearance, on the Plaintiff's Attorneys within TWENTY (20) DAYS after the service of this Summons, exclusive of the day of service (or within THIRTY (30) DAYS after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

DATED: Buffalo, New York
April 23, 2024

LIPSITZ GREEN SCIME CAMBRIA LLP

By: 

JOSEPH J. MANNA, ESQ.

Attorneys for Plaintiff

Office and P.O. Address

42 Delaware Avenue, Suite 120

Buffalo, New York 14202-3924

(716) 849-1333

[JJM 72663.0002]

STATE OF NEW YORK
SUPREME COURT : COUNTY OF NIAGARA

KAITLYNN GANNON,

Plaintiff,

VERIFIED COMPLAINT

vs.

Index No:

SHERIFF MICHAEL J. FELICETTI
NIAGARA COUNTY SHERIFF'S OFFICE, and
JOHN AND JANE DOE
COUNTY OF NIAGARA,

Defendants.

Plaintiff, Kaitlynn Gannon, by her attorneys, Lipsitz Green Scime Cambria LLP, against
Defendants, hereby alleges the following:

INTRODUCTION

1. This is a civil rights action for damages caused by Defendants to Kaitlynn Gannon following the illegal release and publication in December 2023 of reports, papers, and other documents pertaining to incidents of sexual assault Plaintiff endured in October 2021.

2. Since 1991, it has been clearly established New York State Law that reports of sexual assault and abuse to local authorities must remain confidential and not subject to public release. Indeed, as the Court noted in *Deborah S. v. Diorio*, 153 Misc.2d 708, 583 N.Y.S.2d 872 (1992), when Governor Mario M. Cuomo signed Civil Right Law § 50-b and § 50-c into law in 1991, he stated in his Governor's Memorandum as follows:

Rape, incest and sexual assault victims have unfortunately had to endure a terrible invasion of their physical privacy. They have a right to expect that this violation will not be compounded by a further invasion of their privacy. All too often identifying the victim results in public recounting of the details of the crime.

The release of such identifying information does not serve the interest of justice. Indeed, it does a gross disservice to both the victim and the public. Concerns pertaining to privacy sometimes results in a victim failing to report a sexual offense. In its final report, the Governor's Task Force on Rape and Sexual Assault documented that sexual offenses are vastly underreported. Undoubtably, there is even less incentive for a victim to report sexual assault.

“[This law] will be an important safeguard for the privacy of sexual offense victims. The bill is approved.” (McKinney’s 1991 Session Law pp. 2211-2212).

3. The *Diorio Court* went on to state “th[e] choice of dignity must remain with the victim, who must cope with: post-rape trauma; nightmares; possible unwanted pregnancy; terrifying concern with the HIV virus; and loss of a sense of security. Such lies behind the public policy that enacted the above 1991 Amendments to the Civil Rights Law § 50-b and § 50-c”

4. As early as 2007, the Second Circuit ruled that police disclosure of records relating to a sexual assault victim is “clearly the type of ‘highly personal’ information that we have long recognized as protected by the U.S. Constitution from governmental dissemination absent a substantial government interest in disclosure.” *Sealed Plaintiff #1 v. Farber*, 212 Fed. Appx 42 (2nd Cir. 2007). In rejecting municipal immunity claims asserted by a local police chief who releases sexual assault records, the Second Circuit stated, “[i]ndeed, this precedent makes clear that plaintiff’s rights [to non-disclosure of sexual assault records] were constitutionally protected in August 2001 when the events giving rise to this lawsuit transpired.”

5. Despite her clearly established U.S. Constitutional Right to Privacy and her New York Statutory Rights under Civil Rights Law § 50-b, Defendants nevertheless released to the public confidential sexual assault records concerning Plaintiff, all to her great damage and harm.

6. Consequently, Kaitlynn Gannon seeks both compensatory and punitive damages, declaratory relief, and an injunction ordering Defendants to refrain from releasing any more

records relating to sexual assaults committed upon all sexual assault victims in conformity with Civil Rights Law § 50-b.

PARTIES

7. Plaintiff, Kaitlynn Gannon, is a resident of Niagara County, New York.

8. In October 2021, Plaintiff was a victim of sexual offenses as defined in Article 130 of New York Penal Law, and as otherwise defined in Civil Rights Law § 50-b.

9. Upon information and belief, Defendant, Sheriff Michael J. Filicetti, is the Niagara County Sheriff with his principal offices at 5526 Niagara Street Exit, Lockport, NY 14095 and is a custodian of certain records pertaining to this action.

10. Upon information and belief, Defendant, Niagara County Sheriff's Office, is a political subdivision of the County of Niagara, State of New York, with its principal offices at 5526 Niagara Street Exit, Lockport, NY 14095 and is a custodian of certain records pertaining to this action.

11. Defendant, County of Niagara, is a political subdivision of the State of New York, with its principal offices at 175 Hawley Street, Lockport, NY 14095 and is a custodian of certain records pertaining to this action.

12. Upon information and belief, Defendants, John Doe and Jane Doe ("the Doe Defendants"), are employees of the County of Niagara and/or Niagara County Sheriff's Office acting within or without the scope of their employment at all times relevant herein. The names of the Doe Defendants are unknown to Plaintiff, but they are the individual Defendants who illegally released the confidential sexual assault records complained about herein. Upon discovery of the individuals' names, their name(s) will be added herein.

FACTUAL ALLEGATIONS

13. Defendants, at all times relevant hereto, acted under color of state law, custom or usage, and acted within the scope of their authority as public entities and/or public employees.

14. All of the acts, actions and inactions alleged herein were done by Defendants acting directly or through their agents, servants or representatives (such as the Doe Defendants), under color of state law, custom or usage, within or without the scope of their authority and employment.

15. In October 2021, Kaitlynn Gannon was a victim of sexual assaults as defined by Article 130 of New York's Penal law and New York Civil Rights Law § 50-b, which was properly reported to Niagara County law enforcement, including to the Defendants.

16. Plaintiff supplied a photograph of one suspected assailant to law enforcement, who presented at her front door in October 2021 wearing gloves, which was provided to the Niagara County Sheriff's Office. A copy of the photograph is annexed as **Exhibit A**.

17. Plaintiff supplied the name of one suspected assailant to law enforcement, "R.T.",¹ which was provided to Niagara County Sheriff's Office.

18. Niagara County Sheriff's Office never identify the man in the photograph.

19. Niagara County Sheriff's Office did not take a written statement from "R.T." or anyone about his whereabouts on the dates of the assaults.

20. Niagara County Sheriff's Office met with "R.T." on one occasion and were satisfied that he was not "in town" on any of the dates of the sexual assaults based on "R.T.'s" personal calendar and verbal assurances.

21. Aside from looking at his calendar, and speaking with him, Niagara County Sheriff's Office did nothing to verify "R.T.'s" whereabouts on the dates of the sexual assaults.

¹ Plaintiff uses the initials "R.T." as a pseudonym in the unlikely event that the man she named was not her assailant.

22. Aside from meeting “R.T.” on one occasion, Niagara County Sherriff’s Department did nothing more to identify the assailant captured on the photograph given to law enforcement.

23. Although sexual abuse occurred in the parking lot of Plaintiff’s former employer’s place of business, Niagara County Sherriff’s Office did not secure any witnesses or video of the parking lot where the abuse took place.

24. Although sexual abuse occurred at Plaintiff’s former’s employers place of business, and suspects appeared inside that place of employment, Niagara County Sherriff’s Office did not seek to secure any statements, witnesses, photos or video concerning the abusers being inside the premises.

25. Niagara County Sherriff’s Office did not interview Plaintiff, at all, about the sexual assaults.

26. Niagara County Sherriff’s Office did not request medical authorizations seeking Plaintiff’s treatment records after the aforementioned assaults.

27. Niagara County Sherriff’s Office did not request medical authorizations seeking photographs of the injuries Plaintiff sustained after the aforementioned assaults.

28. Niagara County Sherriff’s Office did not follow up on DNA testing that had been ordered relative to sexual abuse.

29. Although foreign objects were used to abuse Plaintiff, Niagara County Sherriff’s Department did not secure any of it, including an item that was placed in the hand of a law enforcement officer by a medical provider who retrieved and secured a foreign object.

30. Niagara County Sherriff’s Office did not request medical authorizations seeking permission from Plaintiff to discuss medical provider findings made after the sexual assaults.

31. Niagara County Sherriff's Office did not request medical authorizations seeking permission from Plaintiff to discuss mental health provider findings made after the sexual assaults.

32. Niagara County Sherriff's Office did not request an interview with those accompanying Plaintiff to medical facilities seeking treatment after the sexual assaults.

33. Niagara County Sherriff's Office did not interview, or seek to interview, any medical personnel involved in plaintiff's care and treatment following the abuse she endured.

34. Niagara County Sherriff's Office never received an official or authorized report from the Federal Bureau of Investigation ("FBI") concerning Plaintiff.

35. Upon information and belief, the Defendants obtained and prepared reports, documents, and other papers relating to the sex assaults referenced above which Plaintiff endured and reported.

36. Pursuant to Civil Rights Law § 50-b, and the United States Constitution's Right to Privacy, the reports, documents, and other papers stored with Defendants and prepared in response to Kaitlynn Gannon's allegations of sexual assault are confidential and not subject to public disclosure.

37. Upon information and belief, prior to November 17, 2023 and on November 17, 2023, Defendants released sexual assault records to: (a) the Erie County District Attorney, who in turn, released them to others, including a TV reporter; and (b) an individual purporting to be "Tess Harmon," all in violation of the Federal Civil Rights Act (42 U.S.C. §1983), the United States Constitution and New York Civil Rights Law § 50-b.

38. Thereafter, Tess Harmon further disclosed and disseminated the documents she received from Defendants to certain Facebook users knowing that they would be selectively disseminated on the internet for the world to see.

39. Facebook users and/or Tess Harmon selectively published on December 19, 2023 to the date of this Complaint some of the documents, reports and other papers requested and received from Defendants by Tess Harmon on a Facebook Group named “The Truth about ‘The Ugly Truth’ Podcast” as follows:

INTENTIONALLY LEFT BLANK



The Truth about "The Ugly Truth" Podcast

December 19 at 8:04 AM · 🌐

...

In Kait's recent podcast, she discussed something bad that happened to her two years ago. We were able to FOIL these records.

Per the investigator: "Ms. Gannon has made similar allegations in the past that were shown to be unfounded by the FBI and WNY Human Trafficking Task Force."

CASE SUPPLEMENTAL ACTIVITY REPORT NIAGARA COUNTY SHERIFF'S OFFICE

02-28-22 I was assigned a case regarding allegations of sex abuse made by KATELYNN GANNON of Ridge Road in Lewiston. The incidents reportedly occurred at her residence in Lewiston and in the City of Lockport. Lockport Police Det. TRICIA VOSBURGH was also involved in the investigation. On 01-06-22, Det. Vosburgh took a written deposition from Ms. Gannon. That statement is included in this case file. One of the incidents occurred when she left her job at Elderwood in Lockport, a male she knows as [REDACTED] took her in her vehicle and drove around with her, ultimately sexually abusing her. Ms. Gannon alleged that [REDACTED] has also showed up at her residence.

Det. Vosburgh had photographs of [REDACTED] that Ms. Gannon positively identified as being the man who assaulted her. Ms. Gannon also had Ring doorbell camera footage from her residence at [REDACTED] of the man she identified as [REDACTED]. Inv. JUSTIN BIRMINGHAM and Det. Vosburgh responded to [REDACTED] residence to try to speak with him. He was not home. Det. Vosburgh made contact with him via phone and he advised her that he was in Miami but could meet with them on 03-01-22 at the [REDACTED] Fire Department.

03-01-22 Inv. Birmingham and Det. Vosburgh met with [REDACTED] at the [REDACTED] Fire Department. He advised them that he did not know who Ms. Gannon was and he did not recognize her picture. He also did not recall being at any house on Ridge Road. They showed him the Ring footage and he advised them that it was not him. Inv. Birmingham noted that [REDACTED] is [REDACTED] and is bigger than the person in the footage. [REDACTED] also stated that during the dates in question reported by Ms. Gannon (October 22, 2021, October 26, 2021 and October 29, 2021) he was on a cruise. He showed them the calendar on his phone to prove this.

Ms. Gannon has made similar allegations in the past (not against [REDACTED]) that were shown to be unfounded by the FBI and WNY Human Trafficking Task Force. I spoke with Det. Vosburgh and she advised that she would be closing her case soon. This case is closed.

Inv. Theresa Nietzel Erie Co. - [REDACTED]
2019 - initiated investigation

- Did confirm allegation about uncle's abuse by an uncle

- closed due to lack of ~~investigation~~ evidence

NO cooperating info {
- above garage is apartment
- he would bring clients over
- abused
- put in cages
(all historical information)

- counselor always there

- cameras - known about ^{last didn't}
- pole cameras - NOT known about

- not able to corroborate any evidence
- all brought in by Kaitlyn

3/15/22 (TV) yf/aa

- car was rented
- don't know how to get into car
- why did you get into car
- I didn't think I had a choice
- I've never had a choice before & if I don't do it now it's worse later
- yeah & he has hurt me

[REDACTED]
Whisper name is associated w/ my Dad
Ronald Rock

- left promises - two men in car & one driving
- on floor in back

→ [REDACTED] was assaulting me in back of my van or the other was driving away

3/15/22 Phone Call w/ Kaitlyn Gannon yf/aa (TV)
Other Guy

- we are waiting for you in late

- send text to Kait (send address to Kait)

- she's going to send me photos

- discussed calling 911 as they're all happening

04/25/22 (TV) yf/aa

Interview w/ Kaitlyn Gannon

- Friday 3/18 - Storage facility - not physically seen w/ phone @ Lockwood - okay

↑ there approximately 1 hour
hair salon
Green roof

Tuesday - +10

Killer's park
- bike path, nurse behind park
- apartment - on river area - bike path
- family creek across street - 4 mile golf course

Dance
- dress - 1615-1730 hrs pickup
- occurred with this time frame



8

71 comments 1 share

40. One document released by Defendants and illegally published on Facebook by others falsely reads, “Ms. Gannon has made similar allegations in the past . . . that were shown to be unfounded by the FBI and WNY Human Trafficking Task Force.”

41. Upon information and belief, neither the FBI nor the WNY Human Trafficking Task Force concluded that Plaintiff’s allegations or “similar allegations” were “unfounded.”

42. Neither the FBI nor WNY Human Trafficking Task Force were involved with investigating the 2021 sexual assaults Plaintiff endured.

43. Neither the FBI nor the WNY Human Trafficking Task Force released any conclusion relating to whether Plaintiff had been abused.

44. To plaintiff’s knowledge, the FBI and WNY Human Trafficking Task Force have abided by the confidentiality obligations imposed upon each of them by law.

45. Nevertheless, Tess Harmon, anonymous Facebook posters and others have seized on Defendants’ hearsay statement and other records Defendants illegally disclosed to discredit, malign, and injure Plaintiff.

46. Moreover, Defendants’ disclosure of the documents via Facebook with untruthful and false commentary from multiple “anonymous posters” was intended to, and has, damaged Kaitlynn Gannon and has exposed her to public scorn and ridicule.

47. In illegally releasing the confidential records, Defendants invited the public to selectively use the same to maliciously injure and attempt to discredit Plaintiff, including adding defamatory false comments which Tess Harmon and other anonymous posters have been published to the above post’s thread, while “tagging” Plaintiff to inflict maximum damage on her.

48. These comments are available for the world at large to view and interact with and are annexed hereto as **Exhibit B**.

49. As a direct and proximate result of the above-described conduct, Kaitlynn Gannon has been damaged, subjected to public scorn and ridicule over both social media and in public.

50. As a further direct and proximate result of the above-described conduct, Kaitlynn Gannon has suffered the deprivation of precious Constitutional and New York State Rights, to her great detriment, damage and loss.

FIRST CLAIM
(42 U.S.C. § 1983 – Municipal, Supervisory and Individual Liability)

51. Plaintiff hereby incorporates the above paragraphs by reference as though fully set forth herein.

52. Heretofore and on or about the 3rd day of January, 2024, a Notice of Claim was served on behalf of Plaintiff Kaitlynn Gannon upon SHERIFF MICHAEL J. FELICETTI, NIAGARA COUNTY SHERIFF'S OFFICE, and COUNTY OF NIAGARA in duplicate, which Notice of Claim sets forth the name and post office address of Kaitlynn Gannon, claimant, the name and post office address of her attorneys, the nature of the claim, the time when, the place where and the manner in which the claim arose, together with the items of damage and injuries then known to exist, and the said Notice of Claim was served upon Defendants SHERIFF MICHAEL J. FELICETTI, NIAGARA COUNTY SHERIFF'S OFFICE, and COUNTY OF NIAGARA, within ninety (90) days of the date upon which the claim rose.

53. At least thirty (30) days have elapsed since the service of each Notice of Claim as aforesaid, and Defendants, SHERIFF MICHAEL J. FELICETTI, NIAGARA COUNTY SHERIFF'S OFFICE, and COUNTY OF NIAGARA, have failed and neglected to adjust or pay any of the said claims.

54. Niagara County and/or the Niagara County Sherriff's Office has a policy, practice and/or custom of releasing records relating to sexual assaults once the case is "closed" in violation of the United States Constitutional Right to Privacy in such records.

55. On December 19, 2023, a deputy from the Niagara County Sherriff's Department told Plaintiff that sexual assault records identifying victims are available to the public "on a closed case." Thereafter, the deputy and another individual assisted Plaintiff in securing a copy of the records that were also previously disclosed to Tess Harmon.

56. The Niagara County Sherriff, Defendant, Michael J. Filicetti, who is the final policy maker, directly committed, permitted, or commanded the violation of Plaintiff's rights by allowing the release of the confidential documents pursuant to the aforesaid policy, practice and/or custom.

57. Further, the Doe Defendants violated Plaintiff's Rights to Privacy by releasing the confidential documents pursuant to the aforesaid policy, practice and/or custom and/or on their own without authority to do so.

58. The aforesaid policy, practice and/or custom and the release of the records caused Plaintiff to be deprived of a Constitutionally protected Right to Privacy as previously recognized by the Second Circuit in *Sealed Plaintiff #1 supra*.

59. The Defendants' actions were recklessly indifferent to Plaintiff's Civil Rights, and callously disregarded her Right to Privacy. As such, punitive damages should be awarded against the individual Defendants in a sum to be determined at trial.

60. By their actions, as aforesaid, Defendants have jointly and severally deprived Kaitlynn Gannon of her rights under the United States Constitution, in violation of 42 U.S.C. §§ 1983 and 1988.

61. As a consequence, Defendants are liable to Plaintiff for economic, non-economic, and punitive damages in an amount to be proved at trial with costs, interest, disbursements and attorney fees pursuant to 42 U.S.C. 1988.

62. Kaitlynn Gannon was required to hire attorneys to represent her in this matter and is thus entitled to an award of reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988.

SECOND CLAIM
(N.Y. Civ. Rights Law §§ 50-b and 50-c)

63. Plaintiff incorporates the foregoing paragraphs by reference as though fully set forth herein.

64. By their actions, Defendants have deprived Kaitlynn Gannon of her statutory rights under the New York Civil Rights Law § 50-b. She therefore invokes her rights under Civil Rights Law § 50-c.

65. Civil Rights Law § 50-b(1) provides, in relevant part, as follows:

The identity of any victim of a sex offense, as defined in article one hundred thirty . . . of the penal law, or of an offense involving the alleged transmission of the human immunodeficiency virus, shall be confidential. No report, paper, picture, photograph, court file or other documents, in the custody or possession of any public officer or employee, which identifies such a victim shall be made available for public inspection. No such public officer or employee shall disclose any portion of any police report, court file, or other document, which tends to identify such a victim except as provided in subdivision two of this section.

66. The revelation of Plaintiff's identity and records relating to her sexual assaults to Tess Harmon by Defendants constitutes illegal and wrongful disclosure in violation of the confidentiality provisions of § 50-b of the New York Civil Rights Law.

67. As a result of the wrongful disclosure of Kaitlynn Gannon's identity, she has suffered economic and non-economic injury in an amount to be proved at trial with interest, costs, and disbursements.

68. As a result of the wrongful disclosure, Kaitlynn Gannon has also incurred expenses for attorney's fees of this action, which are sought pursuant to § 50-c of the Civil Rights Law.

69. Kaitlynn Gannon brings this action in accordance with Section 50-c of the New York Civil Rights Law which affords a private right of action to the victim of a sex offense whose identity has been disclosed in contravention of Section 50-b, and who has suffered injury by reason of such wrongful disclosure.

70. Kaitlynn Gannon is entitled to both compensatory and punitive damages in an amount to be determined by the trier of fact.

THIRD CLAIM
(Intentional Infliction of Emotional Distress)

71. Plaintiff incorporates the above paragraphs by reference as though fully set forth herein.

72. The Defendants' actions are extreme, outrageous, utterly intolerable in a civilized society with intent to cause severe emotional distress. Indeed, Defendants' actions are shocking and exceed all bounds of human decency and what any average member of the community would tolerate.

73. In addition, the Defendants' conduct has been so plainly in excess of accepted standards of behavior that Kaitlynn Gannon is entitled to punitive damages in an amount to be determined at trial.

74. By reason of the foregoing, Kaitlynn Gannon has suffered damage including, severe emotional distress and anguish for which Defendants are liable with punitive damages, costs, disbursements, interest and attorney fees.

**FOURTH CLAIM
(Negligent Infliction of Emotional Distress)**

75. The foregoing paragraphs are hereby incorporated by reference as though fully set forth herein.

76. Defendants owed and breached a duty to Plaintiff causing her damages including endangering her physical safety and causing her to fear for her physical safety for which the Defendants are liable with costs, interest, attorney fees and disbursements.

**FIFTH CLAIM
(Defamation)**

77. The foregoing paragraphs are hereby incorporated by reference as though fully set forth herein.

78. Defendants' publication of said records included the false statement that "Ms. Gannon has made similar allegations in the past . . . that were shown to be unfounded by the FBI and WNY Human Trafficking Task Force."

79. Upon information and belief, the FBI has never disclosed that Plaintiff had made similar allegations in the past that were shown to be unfounded.

80. Upon information and belief, the WNY Human Trafficking Task Force has never disclosed that Plaintiff had made similar allegations in the past that were shown to be unfounded.

81. Plaintiff previously made a FOIL request to the FBI related to any documentation it maintains concerning her documented prior abuse.

82. In response, the FBI supplied plaintiff with pages of heavily redacted reports. None of the documents disclosed to Plaintiff by the FBI indicated that she made claims that were determined to be “unfounded.”

83. In fact, in 2004, the Erie County Sherriff’s Office prepared a report about plaintiff being repeatedly sexually assaulted by someone she knew and identified. Said report documented that a call was placed to “the FBI and Jacquiline Dougher interviewed Kaitlynn [Gannon]. [FBI] Agent Dougher found her very credible”

84. Just as the Niagara County Sherriff’s Department failed to protect and serve Plaintiff in 2023, so too did the Erie County District Attorney’s Office and Erie County Law Enforcement in 2004.

85. Despite the FBI finding of credibility, neither the FBI nor the Erie County Sherriff Office prosecuted the known and identified assailant, David McMoil.

86. Defendants were neither authorized to, nor privileged to, release the records concerning Plaintiff’s October 2021 sexual assaults.

WHEREFORE, Kaitlynn Gannon prays for a judgment against Defendants on each cause of action pleaded herein as follows:

- A. Award of actual, presumed and compensatory damages in an amount to be proved at trial;
- B. Award of punitive damages in an amount necessary to deter the Defendants from engaging in similar conduct in the future, and especially as it relates to other victims of sexual assault in Niagara County, in an amount to be proved at trial;
- C. Award of interest and costs, disbursements and reasonable attorneys’ fees;
- D. An injunction against Defendants ordering them to refrain from releasing any further records in violation of Civil Rights Law 50-b pertaining to Plaintiff or any other person protected by said law; and
- E. Such other and further relief as the Court may deem just and proper.

DATED: Buffalo, New York
April 23, 2024


LIPSITZ GREEN SCIME CAMBRIA LLP

By: 
JOSEPH J. MANNA, ESQ.
Attorneys for Plaintiff
42 Delaware Avenue, Suite 120
Buffalo, New York 14202-3924
(716) 849-1333
jmanna@lglaw.com

ATTORNEY VERIFICATION

STATE OF NEW YORK)
) SS.:
COUNTY OF ERIE)

JOSEPH J. MANNA, being duly sworn, deposes and says that he is an attorney admitted to practice in the courts of New York State and partner with the law firm Lipsitz Green Scime Cambria LLP, attorneys of record for Plaintiff in the within action; that deponent has read the foregoing Complaint and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters deponent believes it to be true. The grounds of my belief as to all matters not stated upon my own knowledge are as follows: A review of the file kept in my office and based on communication with the Plaintiff herein. Deponent further says that the reason this verification is made by deponent and not by Plaintiff in that Plaintiff does not reside within the county where deponent has his office.



JOSEPH J. MANNA, ESQ.

Sworn to before me this
23rd day of April, 2024.



Notary Public

JENNIFER L. LOCK
Notary Public, State of New York
Qualified in Niagara County
01LO6128803
My Commission Expires June 20, 2025

EXHIBIT A

ring.com



EXHIBIT B

The Truth about "The Ugly Truth" Podcast

December 19, 2023

In Kait's recent podcast, she discussed something bad that happened to her two years ago. We were able to FOIL these records.

Per the investigator: "Ms. Gannon has made similar allegations in the past that were shown to be unfounded by the FBI and WNY Human Trafficking Task Force."

CASE SUPPLEMENTAL ACTIVITY REPORT

NIAGARA COUNTY SHERIFF'S OFFICE

02-28-22 I was assigned a case regarding allegations of sex abuse made by KATELYNN GANNON of Ridge Road in Lewiston. The incidents reportedly occurred at her residence in Lewiston and in the City of Lockport. Lockport Police Det. TRICIA VOSBURGH was also involved in the investigation. On 01-05-22, Det. VOSBURGH took a written deposition from Ms. Gannon. That statement is included in this case file. One of the incidents occurred when she left her job at Elderswood in Lockport, a male she knows as [REDACTED] took her in her vehicle and drove around with her, ultimately sexually abusing her. Ms. Gannon alleged that [REDACTED] has also showed up at her residence.

Det. Vosburgh had photographs of [REDACTED] that Ms. Gannon positively identified as being the man who assaulted her. Ms. Gannon also had Ring doorbell camera footage from her residence at [REDACTED] of the man she identified as [REDACTED] Inv. JUSTIN BIRMINGHAM and Det. Vosburgh responded to [REDACTED] residence to try to speak with him. He was not home. Det. Vosburgh made contact with him via phone and he advised her that he was in Miami but could meet with them on 03-01-22 at the [REDACTED] Fire Department.

03-01-22 Inv. Birmingham and Det. Vosburgh met with [REDACTED] at the [REDACTED] Fire Department. He advised them that he did not know who Ms. Gannon was and he did not recognize her picture. He also did not recall being at any house on Ridge Road. They showed him the Ring footage and he advised them that it was not him. Inv. Birmingham noted that [REDACTED] is [REDACTED] and is bigger than the person in the footage. [REDACTED] also stated that during the dates in question reported by Ms. Gannon (October 22, 2021, October 26, 2021 and October 29, 2021) he was on a cruise. He showed them the calendar on his phone to prove this.

Ms. Gannon has made similar allegations in the past (not against [REDACTED]) that were shown to be unfounded by the FBI and WNY Human Trafficking Task Force. I spoke with Det. Vosburgh and she advised that she would be closing her case soon. This case is closed.

Inv. Theresa Nickel Erico. - [REDACTED]
2019 - in total investigation

- Did confirm allegation about uncle's abuse by an uncle

- closed due to lack of ~~investigation~~ evidence

- above garage is apartment
- he would bring clients over

- advised
- put in cages
(all historical information)

- counselor always there

- cameras known about
- pole cameras ~~not~~ known about

- not able to corroborate any evidence
- all brought in by Kaitlyn

01/18/24
- car was locked
- don't know how to get into car
- why did you get into car
- I didn't think I had a choice
- I've never had a choice before
- I don't do it now it's worse later
- year → he has hurt me

01/18/24
- [REDACTED] rather is associated w/ my dad
- left promises → two men in case → one driving
- on floor in back
- [REDACTED] was assaulting me in back of my van as the other was driving around

01/18/24
Phone conversation Kaitlyn Gannon 1/18/24
Other Guy
- we are waiting for you
- th Katie
- send back # to Kait (send address)
- shes going to send me photos
- discussed calling 911 as things are happening

+10



Only people who follow this Page for more than 24 hours can comment.

All comments

Write a comment...



Author

The Truth about "The Ugly Truth" Podcast

It appears that Kait alleges she was assaulted multiple times the last week of October and again multiple times the first week of November in 2021. During these two weeks, we went to eastern niagara hospital and was examined by Dr. Jennifer Rodgers (presumably a SA examination occurred) AND she was also examined at the Jesse Nash family health center in buffalo. We don't have access to health records, but 6 assaults in 2 weeks and 2 thorough health exams in 2 different organizations.....the investigation was dropped bc it was clear she was not truthful.

4w Like Reply



Kateri Braselton Solberg

The Truth about "The Ugly Truth" Podcast "it was clear" she did not have proof of assaults. Very different.

4w Like Reply



Author

The Truth about "The Ugly Truth" Podcast

So in 6 assaults, not a single piece of DNA evidence was found? that's not how that works.

4w Like Reply



2



Kateri Braselton Solberg

The Truth about "The Ugly Truth" Podcast interesting. The last time I checked, a hard metal object (which the report says she was sexually assaulted with) doesn't have DNA- maybe I am wrong though-

4w

Like Reply



2



Libby Bert

Kateri Braselton Solberg here you come with obvious logic and then there are crickets.

3w

Like Reply



2



Sweet Caroline

The Truth about "The Ugly Truth" Podcast how do you know "that's not how that works?"

3w

Like Reply



4



Libby Bert

The Truth about "The Ugly Truth" Podcast nothing?

3w

Like Reply



3



Sheila Voorheis

The Truth about "The Ugly Truth" Podcast "That's not how that works?" How 'bout this: victim blaming is not cool.

2w

Like Reply



Reply to Kateri Braselton Solberg...





Sweet Caroline

The Truth about "The Ugly Truth" Podcast here is my question for all of you admins (who of course are his friends and relatives). If someone accuses your family member of a crime, and you don't believe it, wouldn't you stand up and defend your relative? Screaming their innocence every chance you get? Instead of doing that, you create a page to try to make the public doubt the victim and never on this social media page have you stood up and spoke loudly of his innocence. I also find it funny that you can say a victim is lying, because you do not have the proof, but yet the said offenders niece was part of Circle C and her family believes her. I'm going to throw it back on you, why should I believe when no proof was shown in that case? If this page was trying to discredit her accusations, I would defend her as well. Btw, I do believe the victims in the circle c case. I think it is disgusting that you throw shade at a victim on social media, just because you don't believe them. What about all the other victims; past, present, and future who are sexually abused around the world? You are showing them it is not safe to speak up. That is appalling. What I also find interesting is that the nephew of accused uses his degree in psychiatry to disseminate articles to try to discredit the victim. I can't wait to hear your response to this.

3w

Like Reply



Libby Bert

Sweet Caroline all. of. this.

3w

Like Reply



Kateri Braselton Solberg

Sweet Caroline bravo

3w

Like Reply



Reply to Sweet Caroline...





Brandon Mitchell

I have a feeling this is going to be an interesting post to follow

5w Like Reply



4



Candace Herman

"Video on pole camera - Kait is the person on video." FBI found she was leaving these threats to herself. That's why they closed the case. It's right there in black and white. Kait can't try to say they closed it because of Covid or because the investigator had other children to worry about or whatever BS she comes up with this week. It's why she doesn't have a restraining order and why Pat said he doesn't think about it that much a few months after his wife alleged strangulation and rape. Anyone who still believes this is clutching at straws.

5w Like Reply



5



Libby Bert

Candace Herman that a lot more information than is on that paper. Where are you getting this information to create this story? No threats are mentioned here.

4w Like Reply



3



Author

The Truth about "The Ugly Truth" Podcast

Libby Bert The lawsuit states that upon information and belief, kait was found by the FBI to be planting her own threats. Certainly this is just an assertion, but it is hard to imagine that Cal's lawyers would make this claim without something to substantiate it since the judge will clearly ask for proof. Candace is referencing this information and these investigative notes seem to support the rumor regarding video evidence of Kait planting threats.

4w Like Reply



3





Libby Bert

The Truth about "The Ugly Truth" Podcast gotcha. You have proven over and over you don't understand the legal system on this page so I won't bother addressing how that works.

I think Candace is making a giant leap here.

No need to tag Kait, we all know who she is. You, on the other hand, you hide.

4w

Like Reply

Edited



Candace Herman

Libby Bert It's not a leap if you think about it for 2 seconds. Kait was/is claiming to be stalked constantly and have threats left at her house. The FBI put multiple cameras up (this is explicit in the documents). They also put up at least one camera that Kait didn't know about (also explicit). If Kait was actually getting threatened, there would have been multiple people on those cameras. But the only person on camera was Kait. Those threats weren't manifesting out of thin air. If she was the one on camera, she was putting them there.

Also, again, these documents say that the FBI closed it because they found her claims unfounded. Not because of Covid, or because of her current claim that the detective had to focus on other kids. She hasn't been honest about why they closed her case.

4w

Like Reply



Libby Bert

Candace Herman you're filling in a lot of space that doesn't exist though. If this is the records none of what you are saying is there. Except that the case was closed.

4w

Like Reply





Candace Herman

Libby Bert It says it was closed *because her claims were unfounded.* That is in the document. Not just that it was closed. That there were multiple cameras, and Kait was the person on the camera that she didn't know was there, is also written in the document.

How did the FBI's cameras not catch any of the people leaving threats but Kait's \$20 Walmart cameras have caught them multiple times? Why was Kait claiming that law enforcement was investigating the threats and the trafficking in November of 2022 when all investigations had already been closed months or years prior?

4w Like Reply Edited



Libby Bert

Candace Herman that's what I said. Is this all of the investigations? Is this even all of the documents? You are adding a great deal of stories that aren't here. You seem to have a great deal of inside knowledge. I wonder who you are protecting.

4w Like Reply



Brandon Mitchell

Libby Bert is it possible that we're just people asking questions? After all, that's essentially what **Candace** is doing. Asking questions. Why is it that Kait's defenders always seem to attack anyone for just simply asking questions? Is it your position that that everyone should just take everything this woman says as gold-standard truth and not question anything? If Kait is indeed being truthful with everything she has claimed, shouldn't her claims stand up to scrutiny?

4w Like Reply





Candace Herman

Libby Bert If you have an alternative explanation as to why the FBI closed the case for being "unfounded" and didn't see any of the numerous people leaving threats at Kait's house, and only Kait herself on camera, you're free to share it. Evaluating evidence and coming to a conclusion is not adding stories. That's what Kait and her fans do (or rather, just make them up). It says right there that the FBI and Human Trafficking Task Force didn't believe her (even you can't deny that) but I'm the bad guy for not taking her ridiculous cage stories as an article of faith?

4w Like Reply



Libby Bert

Brandon Mitchell wait what? Asking questions? She's filling in blanks with her own stories. There is no attack here. Candace, you are 100% adding your own narrative here that simply does not exist in the "evidence" above. Like Brandon said, what's wrong with asking questions. My question is, where are you getting these stories from? You clearly have more information than the investigators, so again, from who? It seems like it's not from Kait's camp, so who? Looks like an accused offender.

4w Like Reply Edited



Author

The Truth about "The Ugly Truth" Podcast
Libby Bert actually the rumor is that Laurie was going around telling people that Kait was on video planting evidence.....so it is Kait's camp ironically

4w Like Reply



Libby Bert

The Truth about "The Ugly Truth" Podcast rumor.

4w Like Reply





Candace Herman

Libby Bert Yes, there were rumors that Laurie told people that the FBI had Kait on video planting threats. Now there is documentation that the FBI doesn't believe her and they had her on a video she didn't know about. It's a heck of a coincidence that it lines up perfectly with the rumor. Anyone who isn't a Kait cultist can put two and two together and see what's going on here.

4w Like Reply



Libby Bert

Candace Herman 6 months ago you presumed she had no attorney or wasn't listening to him when you were all worried that she hadn't responded to the lawsuit yet. Oh how wrong you were.

So, making stories, hoping, and guessing is what this page is about.

Rumors are rumors. Keep spreading them I suppose.

4w Like Reply



Candace Herman

Libby Bert We have FBI statements on our side. You have nothing but made up stories.

4w Like Reply



Libby Bert

Candace Herman I BEG you to produce any document at all that contains a statement from the FBI.

Yours are the made up stories.

4w Like Reply Edited



Brandon Mitchell

Libby Bert what would have to come to light for you to doubt Kait's story?



Libby Bert

Brandon Mitchell why would I need to. That question doesn't make much sense.



2

4w Like Reply



Candace Herman

Libby Bert "Ms. Gannon has made similar allegations that were shown to be unfounded by the FBI and the WNY Human Trafficking Task Force." How is that not a statement from the FBI? Again, even you can't deny that the FBI and the Task Force don't believe her, and they didn't close this case because of Covid.

4w Like Reply



Candace Herman

Brandon Mitchell Literally nothing will sway them. The FBI could release a video of Kait planting threats and they would say it's fake.



4w Like Reply



Brandon Mitchell

Candace Herman agreed. And as this starts to slowly unravel I'll be interested to see how they continue to spin the facts that surface.



4w Like Reply



Libby Bert

Candace Herman unfounded doesn't state, "we don't believe her". Educate yourself. The FBI has released nothing. Keep guessing. Just like Cal's lawsuit, just wait. Keep denying and protecting predators.



4w Like Reply



Libby Bert

Brandon Mitchell nothing takes away from the fact of abuse



Author

The Truth about "The Ugly Truth" Podcast
Libby Bert the lawsuit will bring this out....but while we wait we will continue to FOIL

4w Like Reply



Candace Herman

Libby Bert Keep denying the evidence right in front of you. Just wait. You'll be twisting yourself into bigger knots to defend this woman and believe her fantasies.

4w Like Reply Edited



Libby Bert

Candace HermanThe only twisted fantasies are the ones of the pedophiles and predators in your church.

4w Like Reply



Candace Herman

Libby Bert The "pedophiles" and "predators" don't exist. If they did they would have been on the FBI videos. This is a good thing. Less children being abused is always a good thing.

4w Like Reply



Marten VanZwietering

The Truth about "The Ugly Truth" Podcast I dont have facebook so I (Emily Pici vanZwietering) am on my partner Marts account. Continuing to FOIL and post is a criminal offense. This is not your information to post. Also there is so much filling in the blanks and creating your own narrative here that is not stated. You are the problem and you should be ashamed of yourself. Including the fact that you continue to hide behind a facebook group. We still stand with Kait, I believe her, I am a survivor of this abuse and I will not stand by while you continue to slander her.





Libby Bert

Candace Herman um. No they wouldn't. Why would they be on a video now? That makes zero sense. You are attempting to interpret the above notes to fit your narrative. And while Kait may be on a video, it doesn't say she was doing that. In fact, there ARE videos of offenders, but they deny it's them and investigators say that they "look bigger". Nonsense.

But what they would do is have their narcissistic friends and family run a thinly veiled Facebook page to continue their campaign to discredit the victim.



4w Like Reply Edited



Libby Bert

Marten VanZwietering



4w

Like Reply



Mark Langston

Libby Bert we don't deny abuse happens. It just didn't happen to this lady as many times as she says. According to her. She has be SAed hundreds of times. In three different decades. In dozens of different situations. You have to admit that she can not be telling the truth about all of it and it still be in the realm of possibility. Yes. Someone may have abused her as a child. Yes there are some weirdos in churches. Lord knows that's the truth. But she's now doing this for recognition and money. And it's unraveling. Like it had too. It was to grandiose to stand up to scrutiny. And I don't believe in scrutinizing any and every person who says they were molested. But come on. There's a limit to anything. And I'm here to tell u for a fact. There is nothing happening to any children at cornerstone church now. Regardless of what u believed happened in the past.

4w

Like Reply





Libby Bert

Mark Langston so you're the expert on Kait's abuse. Noted. Even though you repeatedly claim to not know her or anyone involved. Mmmhmmm.

Decades long when it is your own father and mother leading the abuse. Yes.

Recognition and money? That is the most ridiculous statement I've heard.

Also the expert on the treatment of children at Cornerstone when you've claimed to not even attend yourself. Solid.



4w Like Reply Edited



Candace Herman

Libby Bert I thought Kait was saying people were leaving threats at her house? Why wouldn't they be on the FBI video doing this? Do they have invisibility cloaks now?

Nobody has to try to discredit Kait. She's already been discredited by the FBI and several other agencies. But her cultish stans are just clinging to straws to deny this.

4w Like Reply





Mark Langston

Libby Bert I'm not the expert on Kait's abuse at all. As a matter of fact I couldn't question her allegations if it were normal allegations. But she's gotten so ridiculous with her allegations it's impossible. She claims they SAed her in a car multiple times in 2021. And she willing got in the car because it would be worse for her if she didn't. Do u hear that. Not a child. Not a teenager. Big strong advocate Kait two years ago. Is still going along with it. One minute she is standing up to them and not gonna put up with their shit anymore and the next minute she is getting into a car with two subjects because it'll be worse if she don't. Lol. Please. Gimme a break. And she said she knows the offender. And her husband doesn't do a damn thing. That's not the way life works. Not kait. Not Laurie. Not the cooks. The asbachs. Life. Life doesn't work that way

4w Like Reply



Author

The Truth about "The Ugly Truth" Podcast

Mark Langston better yet, the car was locked and the strange men still got in.



4w Like Reply



Mark Langston

The Truth about "The Ugly Truth" Podcast I can't think of a reason why any woman that's walking up to her car and seen two grown men in it wouldn't take off running and screaming. And the whole it'll just be worse later thing. Well I thought she was done with her family's abuse. I didn't think she was still actively being pimped out by this familial cartel consisting of senior citizens. I thought the podcast was the end of that.

4w Like Reply





Libby Bert

Mark Langston yea yea yea. I believed her now I don't. We know.

Normal allegations. What's that? You want a comfortable straightforward abuse statement? What does that even mean.

Please. Tell me how life works. Tell me how a child abused since she was 4 should assert herself when confronted. You understand that adults are abused and trafficked every day.

Sorry her abuse doesn't fit your mold.

4w Like Reply Edited



Libby Bert

The Truth about "The Ugly Truth" Podcast because that would be impossible.

4w Like Reply



Libby Bert

Mark Langston "we". Is that you an who? This page.

4w Like Reply



Libby Bert

The Truth about "The Ugly Truth" Podcast to reply to Emily I see. Hmm.

4w Like Reply



Libby Bert

Candace Herman show me where the FBI discredits. Unfounded doesn't mean that.

The only invisibility cloaks are the ones here. Disguising who you are. Hiding your family's child predators in plain sight. As it turns out, they're not working well.

4w Like Reply Edited



Author





4w Like Reply



Libby Bert

Mark Langston I'm sure you've listened to the statistics on the last podcast today.

4w Like Reply



Libby Bert

The Truth about "The Ugly Truth" Podcast someone getting in a car. If that's your hang-up, good luck.

4w Like Reply



Alison D'amato

Libby Bert unfounded does surely mean it's discredited. A reported crime or allegation that has been investigated and determined to not have occurred and found to be baseless on such evidence and facts don't support the allegation and/or crime.

4w Like Reply

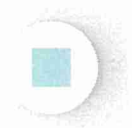


Libby Bert

Alison D'amatono I'm sorry that is wrong.

An "unfounded" finding is not necessarily a determination that the incident that was alleged didn't occur. It could mean that they didn't have enough information, didn't have cooperation, or some other reason that they couldn't determine whether or not it occurred. it does not mean it did not occur, it's baseless or discredits the allegations.

4w Like Reply Edited





Mark Langston

Libby Bert how come rabid fans / supporters of hers are so quick to make molestation and trafficking statistics a part of their truth but yet ignore the most relevant statistic to this situation ? And that is that this situation has NEVER happened ever. In the whole history of the world has this happened. U are gonna sit and tell me. That after her coming out with her podcast. And getting therapy with Krull. And all that. She got into a car with people multiple times and let the abuse continue because she was scared of what would happen if she didn't. But she isn't scared of what will happen if she tells the world on a podcast every other week for years ? Which one is it. ? She's done. She's standing up for herself. Or she's still actively being trafficked by her family that still lives and works on the same small town island they have since this supposedly started some 30 years ago. ? Are u serious. I'm sorry. I'm done. Kick me off the page. Get me a few days banned from Facebook. I don't care. Say what u want. U are an idiot. U shouldn't be allowed a drivers license. U shouldn't be allowed to be in public spaces with the general public. You are dumb. It is no longer a matter of opinion. U are like a flat earther. U are shown evidence of false allegations and instead of admitting that your belief in this very small possibility may be unfounded. U attack the institutions that provide the evidence. The police let the man just make up his own calendar. They are in cahoots. A volunteer Chaplin from the 1890s used to live five houses down from the family. He was a fourth cousin removed. That's why the fbi is turning a blind eye. That's why Liberty university said she was nuts. Cause of money. Cause of ties to the family. Cause they are all in a sex cult. There is no way else to describe this. Youre a fucking idiot.

Like Dislike





Author

The Truth about "The Ugly Truth" Podcast
Mark makes an excellent point. If we are to rely on statistics, someone needs to present a case of ritualistic abuse that turned out to be true. the FBI reviewed 12,000 cases of ritualistic abuse and found none of them to be substantiated.

4w

Like Reply



Libby Bert

The Truth about "The Ugly Truth" Podcast I can't see Marks post. There are plenty of examples from the Catholic Church to the Boy Scouts. We went round and round on this in a previous post a long time ago.

4w

Like Reply





Author

The Truth about "The Ugly Truth" Podcast

Those are not examples of ritualistic abuse. There is a very big difference. Also those examples are not representative of organized abuse as described by Kait, rather they are examples of organizations who looked the other way or even covered up known abuse. Lastly, those cases of abuse within institutions involved MANY victims with a relatively small number of perpetrators. Kait is alleging the opposite, indicating hundreds of men (her direct quote from an interview with a UK newsletter) were involved with a single victim. Christiana and Emily acknowledge in their respective episodes that their abuse was not the same individuals as Kait's. If Kait's claims were true, 6 different law enforcement agencies were complicit in the cover up (including suppression of DNA evidence?). We are supposed to believe that one of the largest sex trafficking rings in the history of the US successfully operated for 30+ years across multiple states with cooperation from local, state, and national law enforcement who has been investigating for decades? By Kait's own admission, CPS investigated her family when she was a child. This family has been on law enforcement's radar for decades. To still believe her claims of organized abuse, you have to suspend all rational thinking.

4w

Like

Reply





Candace Herman

All this talk about "statistics" is a diversion. Even if international organized ritual abuse rings exist, it wouldn't mean Kait's allegations are true. Kait wants to talk "statistics" cause she literally has nothing else. No evidence, and multiple LE agencies found her claims baseless. I mean the freaking FBI put cameras up all over her house. Most actual stalking victims don't get that kind of investigation. But Kait doesn't want to talk about that, so she spews "statistics" as if they prove anything about her individual claims.

4w

Like

Reply



Libby Bert

The Truth about "The Ugly Truth" Podcast I don't need to google articles of familial trafficking, human trafficking, specific cases of sexual abuse with the Catholic Church that was organized, the child marriage in many cults to hide this abuse, and so many other cases. You can do that yourself. (I mean. Look no further than R Kelly!). You can also continue to perpetuate this myth on your page referring to "satanic panic" but we all know that's not what this is. Like I said. We went through this on this page in the past. I demonstrated case upon case of it.

Do you know how many children of abuse suffer for decades? You do. You don't care because it would scare you too much to think that your relatives could be outed. Round and round here with the same nonsense.

4w

Like

Reply





Libby Bert

Candace Herman to your point, if most "actual" stalking victims don't receive this treatment, that should indicate that is of a more serious nature to the FBI. The rumors fly so quickly through the island and the church that it is no surprise that cameras would deter the threats.

Still, NO statement from the FBI, just your statements that are full of rumors and made up stories of hope in trying to protect the Kerns their father, Asbachs, and the named and unnamed.

Spewing stories and "statistics" was the game here, scroll down and take notice.

4w Like Reply



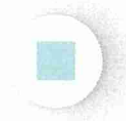
Candace Herman

Libby Bert again you are grasping straws. Police records are not "stories." That the FBI found her claims baseless is a fact, not a story. "They closed it cause Covid" is a story. And yes, the FBI took this seriously, which is the point. But yeah I'm sure Kait was going around telling everyone at the churches the FBI was investigating and the "offenders" found out through the rumor mill. Do you hear yourself? Rumors fly around the island but literally no one heard the rumor about an international child trafficking ring operating out of a small business, 3 small churches, and a pre-k all on the same island for 30+ years. Get real.

4w Like Reply



2





Alison D'amato

Libby Bert you must not have family in law enforcement. She was allegedly SA'd 6 times and it was all unfounded-- and one time by elderwood where there is certainly security cameras. I've known a few women who have been raped. They had the FBI and WNY trafficking unit involved and it was unfounded. Period.

She's surely lucky she didn't report of these allegations in the town of tonawanda- she would've been slapped and charged with false police reports.

She needs a psychiatrist not a social worker.

4w **Like** **Reply** Edited



Libby Bert

Candace Herman I read the reports. You are filling in blanks with your stories from your rumor mill.

3w **Like** **Reply**



Libby Bert

Alison D'amato not law enforcement, but in actual law. Different. And if you know either, so many cases of SA go unpunished, underreported, and unfounded when they absolutely should not.

3w **Like** **Reply**



Author

The Truth about "The Ugly Truth" Podcast

Here is a question, can you name an institution that has looked into Kait's claims AND still believes her? To date, there does not seem to be a single one. Every single time someone looks into her claims, whether it is law enforcement or Mona's house, they come away quietly distancing themselves from her. This is all going to come out in the lawsuit and the truth will be very clear. She has





Alison D'amato

Libby Bert why all this time she hasn't filed for a restraining order of protection against her parents and other alleged abusers. Don't tell me that it's difficult to get a restraining order- judge can easily process an emergency order of protection and work with an advocate out of the court system.

The police in these jurisdictions have been trained by crisis services to better respond to situations relating to domestic violence, sexual assault, child abuse suicide and drug addictions and other issues. Police respond with crisis counselors to the person's home. They even have S. A. F. E. Nurses that respond to the sexual assaults. And this has happened over the last 10 years. That's a FACT.

A woman I know was thrown down the stairs, beaten, strangled and taken to DeGraff hospital and her story was "she tripped and fell down the stairs". The doctor immediately called the police because the injuries were inconsistent with an accident. The police interviewed the abused woman. The police wanted to press charges but the woman decided not to. This happened in early 90s.

So don't tell me Kait went into the hospital and assessed her but the claims were unfounded. She's triggering people I know who have been abused as children and they don't trust her "narrative".

3w Like Reply Edited



Libby Bert

Alison D'amato abusers who do this systematically know how to ensure they're not caught.

3w Like Reply





Sweet Caroline

The Truth about "The Ugly Truth" Podcast. Do you know the saying "Rumors are carried by haters, spread by fools, and accepted by idiots." You fit the bill.

3w Like Reply



Author

The Truth about "The Ugly Truth" Podcast

Sweet Caroline definition of rumor: a currently circulating story or report of uncertain or doubtful truth. so I think Kait would be the hater, and Laurie would be the fool?



3w Like Reply



Author

The Truth about "The Ugly Truth" Podcast

Libby Bert no FBI statement yet, but people have spoken to Jenny Amo

3w Like Reply



Libby Bert

The Truth about "The Ugly Truth" Podcast what people? You?

Didn't she retire over 2 years ago?

3w Like Reply Edited



Alison D'amato

Libby Bert judges can still issue emergency orders of protection with or without substantiating evidence. Then it proceeds with a court date. That's nonsense.



3w Like Reply



Libby Bert

Alison D'amato who is talking about emergency orders?

3w Like Reply



Alison D'amato

Libby Bert are you deliberately obtuse? The amount of harassment and alleged assaults and not filing an emergency order of protection during that time???! Especially with having children that are in danger-- that's considered child endangerment.

3w Like Reply Edited



Sweet Caroline

Alison D'amato, child endangerment....wouldn't that be Kait's parents? Purposely putting their daughter in danger and abusing her.

3w Like Reply



Candace Herman

Sweet Caroline You're deflecting. Why hasn't kait gotten an emergency order of protection against her parents? Especially since she has a family?

3w Like Reply



Sweet Caroline

Candace Herman I'm not deflecting. This whole thing starts with Kait's parents. This page attempts to throw everything back onto the victim. You, Candace Herman, are one of the top people who does that. Like I mentioned on here in a comment the other day, why aren't you proclaiming the innocence of the accused rather than shame a victim? I know you don't believe Kait, so it makes no sense you wouldn't proclaim innocence for them.

3w Like Reply Edited





Candace Herman

Sweet Caroline That's a distinction without a difference and you know it. If I declare someone that Kait has accused is innocent, by definition, I am saying I don't believe Kait. Not to mention, if I just proclaimed the innocence of the accused and didn't give a reason, you would demand evidence for their innocence. This ENTIRE case hinges on Kait's statements. There is NO other evidence, there are NO other accusers that have accused any of the same people Kait has accused. So Kait's credibility is what this case depends on, and Kait is not credible. Her allegations were thoroughly investigated by the FBI and the Trafficking Task Force, and none of the people supposedly threatening her turned up on camera. She has claimed to be threatened in several public places with cameras and that has never materialized either. None of the anti-trafficking orgs that helped her last year are promoting her or her work. And she never got an emergency order of protection despite alleging numerous assaults and threats, and having a family. These are all facts and I have every right to point them out even if you don't like it.



2

3w Like Reply



Sweet Caroline

I hit a nerve, huh? Your anger proves your ties to the family. You have no idea what I know. You can keep spewing your hate and know that I'll have something to say everytime you comment. Have a nice day! 🙄



3

3w Like Reply



Candace Herman

Sweet Caroline You as well.

3w Like Reply



Alison D'amato

Sweet Caroline kait has stated on her podcast that she brought her children a few times too many to the church where her traffickers were and to her parents home where her mom wanted them and she alleges she suspected they were being groomed. Especially when she is claiming she was trafficked by said church organizations and her parents, that is considered child endangerment. I don't care if she is stating she had no choice. Unless there was a court order mandating grandparent visitation rights, she had a choice in that situation to protect her kids at all costs.

If I had parents that did that to me, I don't care what threats I receive, never would I permit them to have any interaction with my kids-- I'd give my life for my children. I've gone through my own share of misery which gives me a different perspective on this situation.

3w

Like Reply



Kateri Braselton Solberg

The Truth about "The Ugly Truth" Podcast "upon information and belief" is a wonderful way to say "it might be possible", "I have a hunch", trust me, it could be completely based on nothing.

3w

Like Reply

Reply to Libby Bert...



Libby Bert

The Truth about "The Ugly Truth" Podcast can't wait for it all to come out. Brace yourself. It won't go the way you want.

3w

Like Reply



4





Author

The Truth about "The Ugly Truth" Podcast

Libby Bert I think most people are done bracing....kait has had a year to substantiate her claims and in that year, she has yet to produce anything corroborative. Every piece of "evidence" remains her word. As stated above, that's very different when the allegations are decades old, but when she is reporting active and ongoing assaults....while allegedly catching them on her ring cameras....and going to the hospital for SA exams....there is a reason why these cases are closed...bc they aren't true. Anyways, Libby if you can come up with a single institution who has looked into her claims and still believes her, please share with the group. If a third party came out and affirmed her claims that would go a long way in terms of credibility.

3w

Like

Reply



Brandon Mitchell

Libby Bert I will state again what I stated several months ago. If proof surfaces to substantiate her claims, I will make a public apology on social media to anyone I've offended. But so far everything that has surfaced has called her credibility into question. I don't think I'm the one who needs to "brace myself" but I stand by my promise.

3w

Like

Reply



Libby Bert

The Truth about "The Ugly Truth" Podcast then why have a page dedicated to discrediting her if you think it's so obvious.

Again, you do not understand how the law works. You think she gets served and then just offers up every bit of evidence? Please educate yourself, you sound ridiculous. Finally we will see with the Kern lawsuits. Talk about unfounded.





Libby Bert

Brandon Mitchell cool

3w Like Reply 



Candace Herman

I remember she used to talk about hiring private investigators... wonder why she hasn't

3w Like Reply



Sweet Caroline

Candace Herman who said she hasn't?

3w Like Reply



Libby Bert

Candace Herman how do you know she hasn't? Just like you knew she didn't have a lawyer? 🤔

3w Like Reply  3



Candace Herman

Libby Bert what institution or group has looked into kaits allegations and still believes her?

3w Like Reply



Libby Bert

Candace Herman it has nothing to do with who believes her. Believing and being able to do something about it is the entire issue here. Unfounded doesn't mean discredited. The investigators at Grace believed her. But then made it worse rather than helping. I don't need to give you any information. You can find it on your own, as you seem very privy to the abusers own info. You are so clueless it's amusing.

3w Like Reply Edited  3



Libby Bert

Candace Herman again. How do you know she hasn't hired





Candace Herman

Libby Bert So no one so far. Even the anti trafficking groups that have looked into her allegations aren't working with or promoting her work at all

3w Like Reply



Candace Herman

Sweet Caroline has she? I look forward to seeing what these investigations find lol

3w Like Reply



Libby Bert

Candace Herman why are the Kerns suing? Why does this page exist? Why are you here trying with all your might? Wondering out loud about private investigators, asking all these questions you supposedly know the answers to (and then you don't) and acting like you know what is happening and going to happen. Because you know or are the abusers.



3w Like Reply Edited

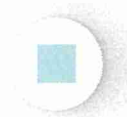


Candace Herman

Libby Bert Why are you here commenting? Why are you desperately reaching with all your might? Because Kait's story isn't true and that's becoming clearer and clearer, but you're a devoted stan so you gotta save face.



3w Like Reply





Libby Bert
Candace Herman ha. I think you mean fan, like she is a celebrity. Which is super weird, you know that, right? No one is a Kait "fan". NOPE. You've got that wrong. I'm a fan of protecting children from cornerstone, (and other church), abusers. I'm a fan of seeing karma come to all the named abusers and their enablers and religious institutions. It's coming. That's why YOU'RE here. To try and stop it.

You look like a fan of abuse and abusers. Who needs to save face? Not me. The people who are hiding behind their FB accounts spending their day protecting predators.



3w Like Reply



Libby Bert
Candace Hermannnotice NO ONE replied to Emily. That's interesting isn't it?



3w Like Reply



Sweet Caroline
Libby Bert think about it. Candace has a connection to the named abusers as do the admins of this page. They try to get people to explain themselves, so they can try to find another angle they haven't thought of to get info. They can believe whatever they want, just like you and I stand with Kait. I am not here to make them believe and share reasons why they should. I'm here to stand up for all those who were and are sexually abused. It takes a lot for someone to speak up, and some never do. I find it a shame that an abuser's nephew, who specializes in psychiatry, thinks it's okay to do this to victims. One would think if a family member was accused they would stand up for them and keep saying they're innocent. Instead, he makes it hard for any victim to speak up. I'll save certain people time in



3w Like Reply



Candace Herman
Libby Bert "stan" is a slang term for crazy fan. Which you are, cause she's a celebrity that can do no wrong to you. It'll come out that she was planting threats and you'll say the FBI was part of the conspiracy. I'm a fan of the truth and the facts which show that kait is a fantasist and a fraud.



2

3w Like Reply



Libby Bert
Sweet Caroline totally get it. I just have a hard time sitting back and not challenging their nonsense. Because they've got nothing but a forum for their church groupies to gather.



2

3w Like Reply



Libby Bert
Candace Herman honestly, if planting a threat is the hill you're dying on, that's good for you if that's what you believe and want to focus on. Does that make you sleep at night? If that's what gives you a glimmer of hope that she wasn't SAed as a child by your friends and family, keep bringing it up.

It will come out that she suffered years of abuse at the hands of her parents and their Church friends. That's what matters.



3w Like Reply Edited



Sweet Caroline
Libby Bert I totally get it. Keep it up!

3w Like Reply



Candace Herman
Libby Bert Oh yeah, I forgot about the possibility that you'll say "so what if she was planting threats, she's telling the



Libby Bert

Candace Herman I mean, that's your angle and that's so darn silly. Focus on the one rumor that you think could discredit her, because the abuse? Well that happened. But if you could just plant a seed of doubt in just one place, your friends and family wouldn't be outed. They will though. Keep trying. But I'll be here to point out your bologna.

3w

Like

Reply

Edited



Candace Herman

Libby Bert You think Kait planting threats against herself and lying about it wouldn't discredit her? That's...telling. But no the abuse didn't happen any more than those threats did.

3w

Like

Reply



Libby Bert

Candace Herman you're wrong and you know it.

You know probably better than anyone that it happened.



3w

Like

Reply

Edited



Candace Herman

Libby Bert I 100% don't believe kait. But I've said it before, I'll apologize to kait (and to you for good measure) if it's revealed to be true. But I know what's actually going to happen. It'll be revealed Kait planted the threats and you'll say that doesn't mean anything and the abuse still happened. Why she would need to fake threats if it was real is something you'll refuse to explain.

3w

Like

Reply



Libby Bert

Candace Herman no one cares if you apologize.

3w

Like

Reply





Sweet Caroline

Candace Herman an apology means nothing.

3w Like Reply



Alison D'amato

Libby Bert actually your assumptions are false. I'm not a member nor have affiliation with any of these churches. Outsider looking in.

3w Like Reply



Libby Bert

Alison D'amato literally what every account here has said. Weird that your only "like" on your FB profile is this page. Seems like a fake account to be here but thanks for your insight.



3w Like Reply



Sheila Voorheis

Repent Mr. Kern. Admit what you did and take the punishment like a man.

2w Like Reply



Sheila Voorheis

The Truth about "The Ugly Truth" Podcast Where in the world would Kait get the pics and videos? Cal's got evidence at his house. Let's do a search!

2w Like Reply



Stephanie Graham

Candace Herman do you think these predators are going to admit what they've done? Especially when the church is defending these monsters? I 100% believe Kait

2w Like Reply





Candace Herman

Stephanie Graham If she's telling the truth, why didn't the people leaving the threats show up on the FBI's cameras? They had several, Kait was the only person that showed up. She's allegedly gotten threats in numerous public places -- no camera footage of that either. FBI did a thorough investigation and found her claims unfounded, as did at least 5 other police agencies. Even anti-trafficking organizations that helped her in 2022 aren't promoting her or her work. No one else has accused any of the same people she's accused, and she's never gotten an emergency protective order against her parents.

What's credible about this? The only evidence of guilt seems to be a Kafka trap, where claiming innocence is itself evidence of guilt.

2w

Like Reply



Mark Langston

She's a fucking lunatic and so are these people that follow her

3w

Like Reply



Libby Bert

Candace Herman and STILL won't proclaim their innocence. This is a FB page, not a court of law, which you are clearly preparing for. You think you can get away with "reasonable doubt", because you KNOW your friends and family are guilty of the worst crimes.

3w

Like Reply Edited



Candace Herman

Libby Bert why would I be preparing for something that Kait herself said is never happening? This isn't about "reasonable doubt" there is no doubt whatsoever that Kait





Libby Bert

Candace Herman ridiculous and absolutely proving my point.

On top of that, you still won't proclaim their innocence.



3w Like Reply Edited



Candace Herman

Libby Bert I proclaim their innocence every time I point out that Kait is a liar. By the way, Kait is a liar. I just proclaimed their innocence again!

3w Like Reply



Libby Bert

Candace Herman I'm so glad you've finally owned up to the fact that your family is involved. That's the first step. Denial only lasts for so long.



3w Like Reply



Candace Herman

Libby Bert I've not owned up to anything dude. Kait is still a liar. I mean you've even said it doesn't really matter if kait planted threats against herself and lied about it. Lol

3w Like Reply Edited

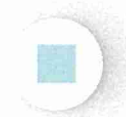


Libby Bert

Candace Herman here you go filling in stories again 🙄

I said that YOU are filling in stories (like Kait planted threats) and that the evidence above does not mention or prove your rumors. I never gave an opinion on whether it matters or not, because it was never proven to have happened. You should go back and read what I wrote, because your made up nonsense will not be tolerated by me.

Just because you say, "Kait is a liar" over and over does not make it true. You are desperate and scared. It's obvious.





Reply to Libby Bert...



Libby Bert

Alison D'amato child endangerment 🌈 you are actually humorous.

If you don't see the absolute irony in that, I'm not sure what you're doing here.

3w

Like

Reply

Edited



Sweet Caroline

Alison D'amato Your misery may give you a different perception, but you obviously do not understand abuse. Every person in the world has had some misery in their life. They will say it's misery, but there are a lot worse things than what they went thro... See more

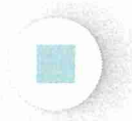
3w

Like

Reply

Edited







Alison D'amato

Sweet Caroline I absolutely do. Thanks for the iteration of material. I have indepth understanding of abuse. Do you understand that the extent of her abuse she alleges requires psychiatric treatment? Not some charlatan social worker who creates a podcast with her client; who mind you has crossed too many ethical boundaries. Google that.

Incidentally, my uncle has been in the psychiatric field for over 30 years in a high ranking position. He would've lost his license doing what Laurie Krull has done. He is extremely diligent about not forming outside relationships with his clients and he works with not only drug addicts, alcoholics but with people who suffered from domestic abuse and trafficking. He also has to deal with pedophiles.

If Kait is telling the truth then all these people should be punished to the fullest extent of the law and lose everything but if she isn't then she should be punished likewise.

What I do notice is that she is apathetic when it comes to other people who have suffered different abuse unless they agree with her. People have every right to question especially when you're broadcasting your narrative and it's been proven by various agencies that the claims are unfounded.

Telling people "just because you haven't gone through the same exact abuse to the T then said person, you don't understand." What one has gone through is irrelevant. You have minimized the abuse and suffering of other people unless it conforms to the T with the alleged abuse Kait claims. She has triggered many people that have gone through abuse (where it's domestic, rape or childhood sexual abuse) with the giggling with her therapist on a
podcast



...and our community that was able to bring someone in.

Any time someone questions anything even if it's simple query- it's a trigger. There's nothing to laugh about.

My cousin, who also is a counselor for trafficking victims, has listened to the podcast with her colleagues stated they have not had one client giggle when discussing the abuse they have endured. It's too traumatic, many of which transferred for hospitalization.

Her trafficking survivor clients have been isolated from school, social activities and the outside world. They don't get American dolls, or pony sides or take missionary trips. And many of them who have been raped as children repeatedly cannot have children of their own or don't want any because of the fear of having kids. She connects her clients with the appropriate agencies to obtain emergency orders of protection; many of which have criminal court cases and those that don't file civil cases. And I'm speaking on Familia trafficking. So do you understand that the clients my cousin deals with that are trafficked as children have damage to their reproductive organs and have had a wealth of diseases and don't have normal dating relationships during their trafficking years?

There's a big difference between questioning the extent of the alleged abuse or the abuse in particular versus blaming the victim for their abuse.

3w Like Reply Edited



Sweet Caroline

Alison D'amato I have not minimized others abuse. I told you everyone reacts differently to abuse. What you are saying is because your cousin says none of their clients act that way then there is no other way to act. If your relatives were really in the filed they would know that laughing is a coping mechanism used to help people make matters





3w

Like Reply



Alison D'amato

Sweet Caroline My family is in fact in the field that are very discrete about protecting their private information on whitepages, social media platforms or in the phone book directory due to the increased risks to themselves and their family members.

Laughing is not a coping mechanism. Krull referred to it as nervous chatter more or less. Therapist giggling along with her... how credible is that?

No, that's not what you said about reaction to abuse. You stated "So, unless you have gone through the exact same type of abuse with the exact same amount and severity of threats, beatings, and brainwashing-you could not understand. No two people who are in an abusive relationship experience the same exact thing".

There are people who have gone through MORE than she has ever alleged. These individuals have been removed from any social contact, unclear, neglected and deprived of food and medical attention. The only companionship they have is a rug in a dark room and bucket to defecate and urinate in. Furthermore many of these victims become too old to be utilized in the trafficking ring so in order to survive they become recruiters because of fear of death. Some of these relatives sell their children for drugs or financial gain. After the now adult is used up, the pedophiles target other children in the family and strangers.

So by your standards, their abuse is far more detrimental than she could ever fathom.

3w

Like Reply Edited



Sweet Caroline

Alison D'amato you seem to have all the episodes memorized, lol. Laughing and smiling are indeed coping mechanisms. You sound like someone with an axe to grind.

3w Like Reply



Libby Bert

Sweet Caroline agreed! Alison, NONE of this sounds like an "outsider looking in". Oh goodness, does that lie discredit you?

Also let's not forget that Kait's mom was a counselor of SA victims at the chapel was she not? So what, same qualifications as your cousin?

3w Like Reply Edited



Sweet Caroline

Libby Bert great point to make about her mom being a counselor at The Chapel!

3w Like Reply



Alison D'amato

Sweet Caroline lol no personal vendetta. 😏 As typical, you and Kait's followers have found surreptitious means to deceive those who are simply questioning her alleged abuse.

3w Like Reply Edited





Sweet Caroline

Alison D'amato 🌈 a follower I am not. Question her abuse if you want. I'm just pointing out that the most of the people aren't questioning the abuse, they jump on and make assumptions and repeat them over and over. You do realize the connection between the accused and the admins, right? This page isn't really for people to question anything. It's for the admins and their family, with fake profiles, to try to detract from their family member by trying to control the narrative. There are people who post here who have shared pm's from admins and other profiles. The they try to trick posters in pm's to get them to slip up and share what they know. You have another person on here who threatens people and then blocks them so they can't respond. If you question the admins enough, they block you. Also, you have an associate pastor, of a named church, who refers church members to this site if they ask questions. He also likes comments shaming Kait. What kind of pastor likes posts that shame? So, this page really isn't for asking questions.

3w

Like Reply



Sheila Voorheis

Totally fake profiles. Candace Herman has 0 friends and one post - from March 2023. No about info, and they follow just one page on fb. Guess which one?

2w

Like Reply



Sheila Voorheis

Alison D'amatow why would you question her abuse? Why would she lie? What's her motivation?

2w

Like Reply



Reply to Sweet Caroline...





Alison D'amato

Libby Bert Oh my. You've caught me red handed-- such a prescient individual you are. So which segment gave me away and ruffled your feathers? 🤔🤔

3w

Like

Reply



Libby Bert

Alison D'amato AI is doing wonders for your vocabulary, but your stance here doesn't sound so intelligent.

3w

Like

Reply



Alison D'amato

Libby Bert I'm flattered. I guess Obama was correct in guiding young individuals to commit themselves to a college education. The only draw back was a significant student loan debt 😊

3w

Like

Edited



Reply to Alison D'amato...



Reply to Candace Herman...



Mark Langston

It's amazing how they say that the lawyers claiming kait sent threats to herself according to the fbi is made up. Like the judge is just gonna allow them to say that with no backup. To put that in your opening brief means u have something from the fbi that says that

4w

Like

Reply



2



Libby Bert

Mark Langston it doesn't.

4w

Like

Reply



Reply to Mark Langston...



5w Like Reply



Mark Langston

Have they still not responded to the lawsuit ?

4w Like Reply



Libby Bert

Mark Langston Are you serious?

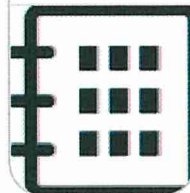
4w Like Reply



Libby Bert

Mark Langston

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IAPPS.COURTS.STATE.NY.US
Document List

4w Like Reply



Libby Bert

Mark Langston And you can expect a response to Sherrie's quite soon too.

3w Like Reply



Reply to Mark Langston...



Libby Bert

He said he was in Miami but would be home later that day and proved it with a picture of his own personal calendar? That's sufficient? That's garbage. Great "investigating". Why would they meet at a fire station? The man is "bigger" in the footage? This is abysmal.

Just because a previous allegation was "unfounded" doesn't mean anything. The investigator sounds biased by the past.

...



5w Like Reply Edited

